

Claims 1-21 are rejected under 35 U.S.C. § 102(e) as being anticipated by Motoyama (U.S. 5,848,386).

Applicants hereby traverse all of the rejections and objections and request reconsideration and withdrawal thereof in light of the amendments and remarks contained herein.

Claim Rejections under 35 U.S.C. § 112

Claims 3, 5, 6, and 7 are rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. The Examiner asserts that the limitation of “said element” on line 4, in claims 3, 5, 6, and 7, lacks clear antecedent basis. Applicants have amended claim 1 to reflect “element.” Withdrawal of the rejection under 35 U.S.C. § 112 is respectfully requested.

Claim Rejections under 35 U.S.C. § 102

Claims 1-18 have been rejected under 35 U.S.C. § 102(b) as being anticipated by Kugimiya et al. (hereinafter Kugimiya). Applicants hereby traverse this rejection. A rejection under 35 U.S.C. § 102 is only appropriate where each and every feature set forth in the claim is present in the reference relied upon. Kugimiya does not show (or even suggest) all of the features recited in claim 1. Claim 1, as amended, recites “converting at least a portion of the source placeable element into a target placeable element.” Kugimiya does not show converting at least a portion of the source placeable element into a target placeable elements.

Kugimiya discloses a machine translation apparatus which specifies a part of the source text that is to be entered into the target text without conversion. As shown in Fig. 13, “Non-conversion” text, identified by markers, is inserted into the translated text as it appears in the source text. There is no converting at least a portion of the source placeable element into a target placeable element as recited in claim 1. The Kugimiya apparatus provides no

meaningful way to change dates, times or measurement from the source language to the target language. The conversion of currency, *e.g.*, dollars to yen, and speed, *e.g.*, miles per hour to kilometers per hour, requires a mathematical conversion, which cannot be gleaned from a dictionary. The Kugimiya system lacks the intellect to accomplish these conversions.

For the sake of completeness, Applicants point out that there is no motivation for modifying the Kugimiya apparatus to satisfy the limitations of independent claim 1 and, as such, claim 1 would not have been obvious to those of ordinary skill in the art.

The differences between what is set forth in claims 2-16, including the limitations of all the claims upon which they depend, are such that they would not have been obvious to those of ordinary skill in the art in view of the cited reference. Withdrawal of the rejection under 35 U.S.C. §102(b) is respectfully requested.

Claims 17 and 18, as amended, recite “a placeable converter.” Kugimiya does not show a placeable converter. Kugimiya discloses a machine translation apparatus which specifies a part of the source text that is to be entered into the target text without conversion. As shown in Fig. 13, “Non-conversion” text, identified by markers, is inserted into the translated text as it appears in the source text. There is no placeable converter as recited in claim 1. The Kugimiya apparatus provides no meaningful way to change dates, times or measurement from the source language to the target language. The conversion of currency, *e.g.*, dollars to yen, and speed, *e.g.*, miles per hour to kilometers per hour, requires a mathematical conversion, which cannot be gleaned from a dictionary. The Kugimiya system lacks the intellect to accomplish these conversions. Withdrawal of the rejection under 35 U.S.C. §102(e) is respectfully requested.

Claims 1-18 have also been rejected under 35 U.S.C. § 102(e) as being anticipated by Motoyama et al. (hereinafter Motoyama). Applicants hereby traverse this rejection. A rejection under 35 U.S.C. §102 is only appropriate where each and every feature set forth in the claim is present in the reference relied upon. Motoyama does not show (or even suggest) all of the features recited in claim 1. Claim 1, as amended, recites “converting at least a portion of the source placeable element into a target placeable element.” Motoyama does not

show converting at least a portion of the source placeable element into a target placeable element. Claim 1 defines a system that has the intellect to covert dates, times or measurement from the source language to the target language, *e.g.*, dollars to yen, and speed, *e.g.*, miles per hour to kilometers per hour.

Motoyama utilizes a source-to-target/target-to source dictionary shown in FIG. 4. This dictionary provides no meaningful way to change dates, times or measurement from the source language to the target language. The conversion of currency, *e.g.*, dollar to yen, and speed, *e.g.*, miles per hour to kilometers per hour, requires a mathematical conversion, which cannot be gleaned from a dictionary. The Motoyama system lacks the intellect to accomplish these conversions.

For the sake of completeness, Applicants point out that there is no motivation for modifying the Motoyama apparatus to satisfy the limitations of independent claim 1 and, as such, claim 1 would not have been obvious to those of ordinary skill in the art.

The differences between what is set forth in claims 2-16, including the limitations of all the claims upon which they depend, are such that they would not have been obvious to those of ordinary skill in the art in view of the cited reference. Withdrawal of the rejection under 35 U.S.C. §102(e) is respectfully requested.

Claims 17 and 18, as amended, recite "a placeable converter". Motoyama does not show a placeable converter. Claims 17 and 18 define a system that has the intellect to covert dates, times or measurement from the source language to the target language, *e.g.*, dollars to yen, and speed, *e.g.*, miles per hour to kilometers per hour.


Motoyama utilizes a source-to-target/target-to source dictionary shown in FIG. 4. This dictionary provides no meaningful way to change dates, times or measurement from the source language to the target language. The conversion of currency, *e.g.*, dollar to yen, and speed, *e.g.*, miles per hour to kilometers per hour, requires a mathematical conversion, which cannot be gleaned from a dictionary. The Motoyama system lacks the intellect to accomplish these conversions. Withdrawal of the rejection under 35 U.S.C. §102(e) is respectfully requested.

CONCLUSION

The differences between what is set forth in the claims and the prior art are such that they would not have been obvious to those of ordinary skill in the art. This application is in condition for allowance, and early notice of same is earnestly solicited. Should the examiner have any questions, comments or suggestions in furtherance of the prosecution of this application, he is invited to contact Applicants' representative by telephone at the number indicated below.

Respectfully submitted,

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Mark Ungelman
Registration No. 32,070

Fulbright & Jaworski L.L.P.
801 Pennsylvania Avenue, N. W.
Washington, D. C. 20004
Telephone: (202) 662-0200